



UTAH Democratic Party

COMPLAINT

October 29, 2004

Office of General Counsel
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

MUR #

5598

RECEIVED
FEDERAL ELECTION
COMMISSION
OFFICE OF GENERAL
COUNSEL

1 2004 NOV -1 P 1:15

Dear Sir or Madam:

I submit this complaint on behalf of the Utah Democratic Party to identify obvious and massive violations of the Federal Election Campaign Act by the John Swallow for Congress Committee, the National Republican Campaign Committee (NRCC) and the Utah Republican Committee (URC). Rather than comply with the law they have conspired to finance illegally a direct mail and canvassing campaign on behalf of John Swallow. They have spent tens, if not hundreds, of thousands of dollars in this illegal effort. This scheme has enabled the John Swallow Campaign to accept financial support from the NRCC far in excess of what is permitted by law. This scheme suggests a pattern and practice by the NRCC of evading the law that is unlikely to have been confined to the Second District of Utah. It also appears that as part of this scheme that NRCC, the URC and John Swallow have misused the nonprofit postal permit of the URC to subsidize illegally the John Swallow campaign.

In interviews, Utah GOP Chairman Joe Cannon and Executive Director Spencer Jenkins have publicly admitted the facts that constitute the violations. These violations are documented in news accounts and interviews conducted and published in the *Utah Deseret Morning News* and *Salt Lake Tribune*. (see exhibits 1-4).

FACTS

1. John Swallow is a Republican and is running in the 2nd Congressional District in Utah.
2. On or about October 23 and 27, 2004, URC mailed two brochures on behalf of John Swallow to some 76,000 2nd District residents. (Exhibits 5-6). Conservatively estimated, the value of these mailings exceed \$76,000. It is believed that these were only the latest of a series of mailings by URC that were developed, mailed and paid for by the NRCC and coordinated with the John Swallow for Congress Committee.
3. Spencer Jenkins executive director of the URC told the *Deseret Morning News* that the NRCC printed, researched and delivered the mailings to the URC.



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29044230942

4. State Republican Party Chairman Joe Cannon told the *Utah Deseret Morning News* that he had not seen the mailings and if it had been up to him that he "wouldn't have sent it out ...State parties across the country are acting as conduits for TV and print advertising created and paid for by the national parties and that is what is happening here."

5. Joe Cannon told the *Salt Lake Tribune* that the fliers were produced for the NRCC by Arena Communications and that Arena Communications would drop off boxes of mailing at the party headquarters. Arena Communications, Cannon said, would take the mailings to the post office for franking under the party's permit.

6. Bo Harmon, a spokesperson for the NRCC told the *Utah Deseret Morning News* "That was a Utah Republican Party piece (of mail). They researched it and printed it. We had nothing to do with it." and "We didn't produce them or pay for them."

7. Joe Cannon and Bo Harmon cannot both be telling the truth.

8. In addition to these two mailings, the URC and NRCC has mailed and distributed by canvass several other pieces on behalf of John Swallow to the voters of the 2nd District.

9. Joe Cannon told the *Salt Lake Tribune* that NRCC workers were brought into the 2nd District from outside the state to work on behalf of John Swallow. These workers were paid for their services by the URC and on information and belief the NRCC.

10. NRCC and John Swallow have coordinated the mailings and canvassing through use of a common vendor. (Exhibit 7)

11. On information and belief the John Swallow for Congress Committee knew of and approved all the above-cited activities directly and through its agents including Arena Communications.

VIOLATIONS OF LAW

The mailings do not qualify as mailings exempt from the contributions and expenditure limits under 11 CFR 100.87 and 11 CFR 147 respectively. Each of those regulations expressly provides that mailings prepared by national party committees do not qualify for the exemption. (See 11 CFR 100.87(g) and 11 CFR 147(g)). Consequently these mailings having been prepared and paid for by the NRCC are subject to the contribution and expenditure limits. The mailings along with other advertising by the NRCC far exceed what the NRCC could lawfully contribute to the John Swallow for Congress Committee.

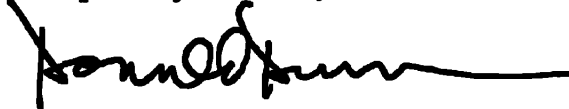
Payments by the URC and the NRCC to individuals doing work on behalf of the John Swallow for Congress Committee must be considered in-kind contributions. These contributions have not been reported and are believed to exceed the contribution limits of the URC and NRCC to the John Swallow for Congress Committee.

On information and belief, the National Republican Congressional Committee arranged and paid for at least two (and apparently up to 14) pieces of advertising in a federal political race and incorrectly and intentionally misstated that they were "Paid for by the Utah Republican Party." In so doing, the NRCC deliberately hid the true identity of who actually paid for and authorized these ads. These deceptions took place approximately one week before Election Day. It is further believed that the John Swallow for Congress Committee knew of and authorized these acts.

The disclosure of the underlying donor is required under FEC rules to inform the public of the true source of the money behind the advertisements. These were negative ads and the voters of Utah should have been told who was truly paying for them. The National Republican Congressional Committee, Utah Republican Party, and candidate John Swallow's apparent efforts to evade the reporting requirement go against these important rules.

The Utah Democratic Party hereby requests the FEC to investigate this allegation and to sanction, fine, or otherwise punish the responsible parties as it sees fit. Given the time frame before this election, the undersigned requests that this matter be of high priority for the Commission.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Donald Dunn", written over a horizontal line.

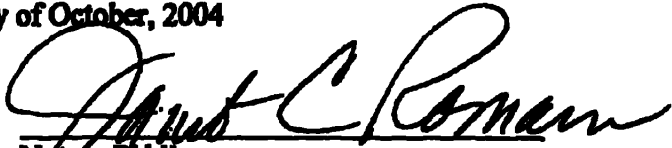
DONALD DUNN
Chair, Utah Democratic Party

20044230943

I, Donald Dunn, hereby certify that the foregoing is true and correct to the best of my knowledge, information and belief.

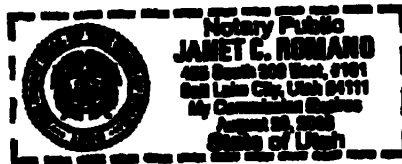

DONALD DUNN

SIGNED AND SWORN to me this 29 day of October, 2004


Notary Public

My Commission Expires:

8-20-04



29044230944

GOP rips Matheson for aiding a GOP bill

State and national parties blame each other for the goof

By Bob Hamrick Jr.
Deseret Morning News



ELECTION
2004

The Utah Republican Party has sent out a mailer still citing Democratic U.S. Rep. Jim Matheson for supporting a bill sponsored by Utah GOP stalwarts Sen. Orrin Hatch and Rep.

Chris Cannon.

State Republican Party executive director Spencer Jenkins said the "unfortunate" situation was discovered by party leaders when the mailers — which he said were printed and researched by the National Republican Congressional Committee — arrived at party headquarters several weeks ago.

"We said, 'Oh, our office has received the mailers,'" Jenkins said.

The mailer criticizes Matheson for supporting congressional efforts to give federal funds to states for education of children who are residents of a state. The Hatch/Cannon bill is called the Dream Act because it aims to help poorer Americans realize the dream of bettering themselves with a college education.

Jenkins said party leaders include Chris Cannon, the older brother of state GOP chairman Joe Cannon, decided to send out the mailer anyway to 75,000 Salt Lake County households in Matheson's 2nd District.

Joe Cannon said Monday night he did not personally see the filer and that if it had been "up to me" he wouldn't have sent it out. "Some parties across the country are acting as conduits for TV and print advertising created and paid for by the national parties and that is what

happened here."

Jenkins said state leaders feared that if the mailers were returned to the NRCC in Washington, D.C., the party PAC would send them out itself. And rejecting the mailer could, Jenkins added, have hurt chances of the NRCC participating in any joint efforts with the Utah GOP.

Matheson's GOP challenger, John Swallow, had nothing to do with the "unfortunate" mailer, Jenkins said.

However, NRCC spokesman Bo Harman said the national party had

Exhibit 2

TUITION

Continued from A1

no part in the mix-up.

"That was a Utah Republican Party piece (of mail). They researched it and printed it. We had nothing to do with it," Harrison said.

The mailer does carry the Utah Republican Party's return address and mailing permit number and says "Paid for by the Utah Republican Party." But Jenkins said party volunteers just addressed the mailer and sent it out and the state party had nothing to do with its content.

The flier reads in part: "Utah families pay taxes for the right to pay in-state tuition..." and Matheson wants to give it away to those who are here illegally."

It details how much Utah families pay in taxes, which, in turn, go to support Utah's colleges and universities. "Jim Matheson. Wrong for Utah families," it adds.

Part of the flier also includes a headline from a Nov. 23, 2003, Salt Lake Tribune article about illegal aliens coming to Utah. The article, Jenkins acknowledged, had nothing to do with illegal aliens getting in-state tuition.

"This (mailer) points out that the national (Republican Party) will do anything, break any trust, have no integrity at all," Matheson said. "They will even throw two of their own (Hatch and Chris Cannon) under the wheels of the bus."

Matheson said that apparently Hatch and Rep. Cannon are also wrong for Utah families.

Hatch was not immediately available for comment Monday.

Monday evening, Rep. Cannon said that he still supports his bill and has no idea why the Utah Republican Party would criticize Matheson for co-sponsoring it. "I don't know what goes on over there."

Swallow and the NRCC have taken a low road in negative campaigning, charged Matheson, who added he was glad to

Utah families pay taxes for the right to pay in state tuition...



Jim Matheson. Wrong for Utah Families.

The state GOP blames national party for putting together this flier.

co-sponsor the Hatch and Cannon bill. The bill is still pending in Congress.

"I hope voters recognize (the campaign tactic) and reject it," Matheson said.

To add more irony to the mailer, in 2002 conservative state Rep. Dave Ure, R-Kamas, a member of the conservative so-called Cowboy Caucus and a candidate for speaker of the Utah House, sponsored a bill that passed the Legislature in 2003 that also gives dependents of illegal aliens who live in Utah the right to pay in-state tuition. Swallow, who was in the state House at the time, voted against it.

The new state law has been working for more than a year, and dozens of students have taken advantage of it, said Nancy Lyon, University of Utah assistant vice president for government affairs.

Jenkins said the NRCC and the Utah Republican Party have worked jointly on 14

separate mailers that have gone out either supporting Swallow, criticizing Matheson or both.

"This is an unfortunate incident," said Jenkins, who when first asked about the mailer by the Deseret Morning News said he did not recall that specific piece of mail and would have to research its origins.

It is too bad that proper "forensight" on the piece was not exhibited, he added, confirming that the piece is about the Hatch/Cannon Dream Act, although the act is not named.

New Federal Election Commission reports show that the NRCC has spent more than \$14 million across the nation on targeted U.S. House races this year, Utah's 2nd District being one of them.

As of Thursday, FEC reports show the NRCC has spent just over \$1 million in pro-Swallow or anti-Matheson TV ads, mailers and telephone calls.

E-MAIL: mp@matheson.com

10/2/74 GOP breaks campaign laws, Utah Demos say

By Bob Bennett Jr.
Deseret Morning News

The Utah Democratic Party is filing complaints with the Federal Election Commission over how the Utah Republican Party, a national GOP PAC and the John Swallow campaign are "coordinating" their efforts this year, Democratic state chairman Donald Dunn said Tuesday.

Standing in the gutter outside of his party headquarters, Dunn threw down pictures of Sen. Orrin Hatch, Rep. Chris Cannon and GOP chairman Joe Cannon to illustrate in his words "how the 2nd District campaign has been thrown into the gutter" by Republicans who "will do anything to unseat Democratic Rep. Jim Matheson."

Dunn also had harsh words for Utah direct mail expert Peter Valcarlos, whose Arena Communications has produced direct mail pieces for Swallow, the Utah GOP and the National Republican Congressional Committee. Dunn called Valcarlos' operations "the king of slick and sneaky pamphleteering."

Dunn called the press conference in response to a Tuesday morning Deseret Morning News article that detailed how the NBCC and Utah GOP acted together to send out an anti-Matheson brochure to 75,000 Salt Lake County residents in the 2nd District.

Swallow, a Republican, is challenging Matheson for the second time. Matheson barely held his seat against a Swallow challenge in 1972.

The mailer, written by Arena Communications with input from others, criticizes Matheson for

Please see PNC on E2

Exhibit 2

p12
10/27/03



Joe Cannon presents to lawmakers a bill in the latter where, he says, the GOP has put the anti-Matheson money

FEC

Joe Cannon presents to lawmakers a bill in the latter where, he says, the GOP has put the anti-Matheson money

supporting a bill in Congress — the Dream Act — that is actually sponsored by Hatch and Rep. Cannon, who is Joe Cannon's younger brother. The act would give in-state college tuition to dependents of illegal aliens.

Valcarce said Tuesday that his, the NRCC's and the Utah GOP's actions "are completely legal. The charge (by Dunn) is bogus." Valcarce said Arena is the third-largest GOP direct mail operation in the nation, this year handling 50 Republican clients in 35 states.

Asked if it is odd that the state and national GOP would criticize Matheson for supporting a bill sponsored by two leaders in the Utah Republican Party, Valcarce said that while Hatch and Rep. Cannon are "great legislators," the Dream Act "is not supported by a majority of Utah Republicans; not supported by a majority of Utahns at all."

Dunn also complained about another Utah GOP filer, one that criticizes Matheson for supporting a new drug benefit for Medicare recipients. That new law was passed by congressional Republicans and signed by President Bush. So, again, said Dunn, GOP leaders are "using sleaze" to accuse Matheson of supporting a Republican plan.

"These mailers are dishonest and ridiculous," said Dunn.

There are, Dunn says, two types of complaints to hold Swallow, state and national Republicans accountable for their actions.

One will claim that the NRCC and the Utah Republican Party are illegally running a coordinated campaign.

The second will say that having Arena Communications handle direct mail for Swallow, the Utah GOP and the NRCC makes it impossible for the campaigns to operate independently, something required by the new McCain-Feingold campaign finance reform law, Dunn said.

"It's hard to believe" the three groups aren't working together on the filers, he added.

It is not unusual for state parties and/or candidates to file FEC complaints toward the end of either campaign. And Dunn admitted that he doubts the FEC will rule or even investigate the Utah Democratic Party's complaints before next Tuesday's elections.

"But the voters need to know what is going on," Dunn said. "Someone needs to take responsibility" for the filers, adding that in the newspaper article Joe Cannon said the NRCC was responsible for the content of the anti-Matheson ads, while an NRCC spokesman said it was an all Utah GOP operation.

Valcarce said he works in this area all the time, and nothing is being done illegally.

The law allows for the Utah GOP and Swallow to operate a

non-allocated mailer campaign, and that's what is being done, he said.

While it's true the NRCC is also paying Arena for direct mail services, "none of my NRCC work is being done in Utah," Valcarce said. He declined to say how much his clients are paying him, nor how many mailers he's sent out in Utah. He maintains the three groups are not working together.

At the very least, said Dunn, the new law is clear that whoever helps send out campaign material must be identified on the ad — and only the Utah Republican Party is listed on the anti-Matheson mailers — not Swallow, not the NRCC.

GOP executive director Spencer Jenkins explained what happened this way: The state GOP hired Valcarce. With input from the state party and the NRCC, Valcarce printed up various filers (the state party has sent out 14 different pieces in the 2nd District race so far). The state party then uses volunteers (they can not be paid workers) to mail out the pieces.

Joe Cannon says the NRCC came up with the Dream Act content, while the NRCC denies that, saying the whole operation was Utah-based.

It may sound complicated, but it's legal, say Valcarce and Jenkins.

No way, says Dunn.

"The new law was written to shine the bright light of day on this kind of smear, so you know who did it," Dunn said.

EMAIL: mpe@utah.com

National, state levels of GOP blame the other for attack ads

2nd District: Neither side takes responsibility for the content of the ads against Matheson; Democrats plan to sue over the "insane campaign"

Utah's Republican Party refuses to pay for two remaining negative direct-mail ads in the 2nd Congressional District.

The national Republican party and the state GOP are blaming each other for a barrage of a dozen mailings sent to Utah voters on behalf of congressional candidate John Swallow. Utah Republican leaders are trying to distance themselves from the ads; the final two mailings will not be sent out.

Meanwhile, Utah Democrats, along with the Republican Party, the National Republican Congressional Committee, and Swallow may have violated new campaign finance rules with the direct-mail campaign.

Republicans were caught in their own fire this weekend when the state party sent voters a mailing criticizing Democratic incumbent Jim Matheson for co-sponsoring a bill that would allow states to grant resident college tuition to the children of undocumented immigrants. The mailing does not

See REP MAILING, C5

GOP mailing causing a rift in the party

(Continued from C1)

mention that Utah Republican Congressman Chris Cannon and Sen. Orrin Hatch also support "The Dream Act."

Another card stuffed in mailboxes Monday accuses Matheson of "siding with big drug companies instead of Utah seniors" when he voted for President Bush's Medicare drug benefit.

Local GOP leaders were enflamed by the negative tone of the 14 mailings and the apparent hypocrisy of at least two that attack Matheson for supporting Republican initiatives.

"We were holding our noses anyway. But that went too far," said Utah Republican Party Chairman Joe Cannon. "I and many others thought these were over the top."

Cannon says the state office had acted as a "conduit" for brochures produced for the NRCC

by Arena Communications' Peter Valencia. Arena workers would drop off boxes of mailings at the party headquarters. Republican volunteers would stamp them. And Arena would take the mailings to the post office for franking under the party's permit. Utah's Republican Party has spent \$118,000 sending 12 mailings to 75,000 voters in the 2nd Congressional District.

"We thought we were being guided by the NRCC in this," Cannon said. "We did not feel we had control over the content."

After fielding complaints from conservative voters and candidate allies, Cannon says, party leaders decided to "disavow" any connection to the direct-mail pieces. But when the NRCC shifted responsibility and shifted the blame back to the Utah party this week, Cannon reviled Arena's use of the party's franking privileges.

"If we actually had the responsibility for sending out these mailers," Cannon said, "many of them would not have gone out."

NRCC spokesman Bo Harmon insists the Washington-based committee, which has spent \$1 million on similar negative television ads and recorded

phone messages, attacking Matheson, had nothing to do with the direct-mail pieces.

"We didn't produce them or pay for them," Harmon said. "This is just a misunderstanding of mail allocation."

But Utah Democratic Party Chairman Donald Dunn said Tuesday he will file a complaint with the Federal Election Commission against the Utah Republican Party, the NRCC and Swallow for breaking federal campaign finance law. Dunn says either Harmon or Cannon is lying about the mailings. Under the Bipartisan Campaign Reform Act, the NRCC should have been listed on the cards. And Dunn believes campaign disclosure forms showing all three paying Valencia for recruiting services reveals illegal coordination between the candidate and the national and state parties.

"Not only has Mr. Swallow turned his campaign over to the NRCC, the NRCC has attacked the state Republican Party and they've taken this election to an all-new low," Dunn said. "People in Utah need to know who's paying for the smear campaign."

Valencia did not respond to a request for comment Tuesday. Neither did Swallow.

Exhibit 3

Oct. 27, '04

20044230949

Article Last Updated: 10/27/2004 01:58 AM

Rolly & Wells: Local GOP stands up for itself

By Paul Rolly and JoAnn Jacobsen-Wells
Salt Lake Tribune Columnists
Salt Lake Tribune

The blowup that led the state Republican Party to stop the National Republican Congressional Committee from using its nonprofit bulk mail permit Tuesday was sparked last week when the NRCC thumbed its nose at several prominent GOP candidates.

During a GOP meeting Thursday, representatives from Jon Huntsman's gubernatorial campaign, Ellis Ivory's Salt Lake County mayoral campaign and Bob Bennett's senatorial campaign criticized the repugnant tone of NRCC ads and fliers on behalf of congressional candidate John Swallow.

The message from the NRCC: We're going to keep doing what we are doing and there is nothing you can do about it.

Not only did state GOP chairman Joe Cannon do something about it by revoking his permission for the NRCC to use the Utah Republican Party mail permit, he informed Republican operatives imported by the NRCC from California to walk door-to-door on behalf of Swallow that their expenses would not be reimbursed by the state party.

Utah Republican Party officials have been swamped by complaints from callers incensed at some of the campaign fliers, including ones that criticized Democratic Congressman Jim Matheson for supporting an immigrant-friendly bill that actually was sponsored by Republicans Chris Cannon and Orrin Hatch, and for supporting a national prescription drug bill that was endorsed and pushed through Congress by the Bush administration.

When the complaints were forwarded to the NRCC, officials there falsely denied responsibility for the fliers, said Cannon.

What comes around . . . Two years ago, several Republican Party officials were stripped of party jobs by Salt Lake County GOP leaders for endorsing Democratic County Council member Randy Horiuchi in his race against Republican Bruce Reading. The officials eventually were reinstated and the leaders who punished them replaced.

Now, Reading is feeling the heat for his publicized support this week of Democratic Salt Lake County mayoral candidate Peter Corroon. E-mails circulating throughout the party suggest Reading be kicked off its Resources Committee. Reading claimed innocence Tuesday, saying Corroon put his name in an endorsement ad without his permission.

Learning by example? The students at Ensign Elementary, who have been taught conservation and responsibility, were troubled Monday morning while noticing sprinklers running at the Salt Lake City-run 11th Avenue Park for an hour during a rainstorm.

—
Paul Rolly and JoAnn Jacobsen-Wells welcome e-mail at rolly_wells@sltrib.com

Exhibit 4

29044230950

29044230951

Utah families pay more than \$600 a year for the right to get in-state tuition...



Jim Matheson wants to give it away...

Utah Republican Party
117 E. South Temple
Salt Lake City, UT 84111

218 180-34012

Postnet Org
US Postage
PAID
Permit No. 186
Salt Lake City, UT



Paid for by the Utah Republican Party

Exhibit 5

Utah families pay taxes for the right to pay in-state tuition...

Last year, the State of Utah spent more than \$619 million to fund Utah's Colleges and Universities. Where does the state get the money? From Utah families. The average Utah family pays more than \$4,603 in state taxes each year.

And each Utah family's share of the budget for higher education is more than \$600.

And Matheson *wants to give it away to those who are here illegally.*



Jim Matheson is leading the fight in Congress to allow the children of illegal immigrants – who don't pay into the system – the right to pay in- state tuition for College.

Salt Lake Tribune
51 Utah-bound illegal
immigrants are caught
near California

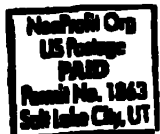
Jim Matheson. Wrong for Utah Families.

*Why is
Jim Matheson
Siding With
**BIG DRUG
COMPANIES**
Instead of
Utah Seniors?*



Utah Republican Party
117 E. South Temple
Salt Lake City, UT 84111

218 280-34012



Paid for by the Utah Republican Party

Exhibit 6

SMALL-C

29044230953

Utah's Seniors Need Affordable Prescription Drugs

So Why Did Jim Matheson Vote to give \$500 BILLION TO BIG DRUG COMPANIES?

(Vote 669, 11/23/03)

Jim Matheson voted to create a new Medicare prescription drug entitlement. The cost of this program adds over \$500 billion to the federal budget.

The program does very little to help seniors and really benefits big drug companies.



In 2003, Jim Matheson voted to add \$500 billion to the federal budget by adding a prescription drug benefit to Medicare that does little for seniors and benefits big drug companies.

And Jim Matheson voted against allowing seniors to access more affordable drugs in Canada.

*Major General***SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBERS:
(Shade only one)

PAGE 24/36

10	11	12	13	14	15
20	21	22	23	24	25

Any information reported from these Reports and Statements may not be sold or used by any person for the purpose of raising contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
John Randall For Congress, Inc.

A Full Name (Last, First, Middle Initial) Arata Communications Mailing Address 515 South 700 East, Ste. 20 City Salt Lake City State UT Zip Code 84102 Purpose of Disbursement CAMPAIGN PRINTING Candidate Name Office Sought: Home State President State District Disbursement For: Primary General Other (specify)		Transaction ID# 1018220411 E1702 Date of Disbursement 10 / 11 / 2004 Amount of Each Disbursement This Period 14322.00 Refund or Disposal of Excess Contributions Required Under 11 C.F.R. 402.63 CAMPAIGN PRINTING
B Full Name (Last, First, Middle Initial) BankCard Center Mailing Address P.O. Box 30888 City Salt Lake City State UT Zip Code 84130-0888 Purpose of Disbursement CAMPAIGN TRAVEL AND OFFICE SUPPLIES Candidate Name Office Sought: Home State President State District Disbursement For: Primary General Other (specify)		Transaction ID# 1018220411 E1701 Date of Disbursement 10 / 01 / 2004 Amount of Each Disbursement This Period 310.00 Refund or Disposal of Excess Contributions Required Under 11 C.F.R. 402.63 CAMPAIGN TRAVEL AND OFFICE SUPPLIES
C Full Name (Last, First, Middle Initial) Jan Black Mailing Address 324 North 1120 East City Orem State UT Zip Code 84057 Purpose of Disbursement REIMBURSEMENT SEE BELOW Candidate Name Office Sought: Home State President State District Disbursement For: Primary General Other (specify)		Transaction ID# 1018220411 E1700 Date of Disbursement 10 / 01 / 2004 Amount of Each Disbursement This Period 1235.00 Refund or Disposal of Excess Contributions Required Under 11 C.F.R. 402.63 REIMBURSEMENT SEE BELOW
SUBTOTAL of Disbursements This Page (optional)		15687.00
TOTAL This Period (Last page lists line number only)		
FEC Schedule B (Form 3) Rev. 08/2003		

Exhibit 7

24962525717

at Quarterly

**SCHEDULE B (FRC Form 3)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(check only one)

PAGE 141/202

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions, or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)

John Swafford For Congress, Inc.

**Full Name (Last, First, Middle Initial)
A. American Express Merchant Fee**

Mailing Address P.O. Box 60822

City
PhoenixState
AZZip Code
85072Purpose of Disbursement
MERCHANT SERVICE FEE

Candidate Name

Office Sought

Home
Senate
PresidentDisbursement For
Primary
General
Other (specify) ☒Category
Type

State

District

Transaction ID: 1012300403E1640
Date of Disbursement

09 / 20 / 2004

Amount of Each Disbursement This Period

4.50

Refund or Disposal of Excess
Contributions Permitted Under
11 C.F.R. 406.50

MERCHANT SERVICE FEE

**Full Name (Last, First, Middle Initial)
B. American Express Merchant Fee**

Mailing Address P.O. Box 60822

City
PhoenixState
AZZip Code
85072Purpose of Disbursement
MERCHANT SERVICE FEE

Candidate Name

Office Sought

Home
Senate
PresidentDisbursement For
Primary
General
Other (specify) ☒Category
Type

State

District

Transaction ID: 1012300403E1541
Date of Disbursement

09 / 22 / 2004

Amount of Each Disbursement This Period

12.25

Refund or Disposal of Excess
Contributions Permitted Under
11 C.F.R. 406.50

MERCHANT SERVICE FEE

**Full Name (Last, First, Middle Initial)
C. Anna Carney Invitations**

Mailing Address 1915 South 750 West, Ste. 2C

City
Salt Lake CityState
UTZip Code
84102Purpose of Disbursement
CHENEY INVITATIONS

Candidate Name

Office Sought

Home
Senate
PresidentDisbursement For
Primary
General
Other (specify) ☒Category
Type

State

District

Transaction ID: 1012300403E1501
Date of Disbursement

07 / 18 / 2004

Amount of Each Disbursement This Period

10542.10

Refund or Disposal of Excess
Contributions Permitted Under
11 C.F.R. 406.50

CHENEY INVITATIONS

SUBTOTAL of Disbursements This Page (optional) >

10542.95

TOTAL This Period (and page this line number only) >

FRC Schedule B (Form 3) Rev. 06/2003

24962525718

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(Check only one)

PAGE 142/202

25	27	28	29	30a	30b

Any information supplied from such receipts and statements may not be paid or used by any person for the purpose of obtaining contributions or for overvalued purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)

John (Stanley) Pae Chrysan, Inc.

Full Name (Last, First, Middle Initial)

A. Arena Communications

Mailing Address 515 South 700 East, Ste. 2C

City Salt Lake City State UT Zip Code 84102

Purpose of Disbursement
CAMPAIGN PRINTING
Candidate Name

Office Sought:	House	Disbursement For:
State:	Senate	Primary
District:	President	General
		Other/Spec: <input checked="" type="checkbox"/>

Category/
Type

Transaction ID: 101230048251882

Date of Disbursement
08 / 28 / 2004

Amount of Each Disbursement This Period

7821.24

Refund or Deposit of Unused
Contributions Required Under
11 C.F.R. 406.10

CAMPAIGN PRINTING

Full Name (Last, First, Middle Initial)

B. Arena Communications

Mailing Address 515 South 700 East, Ste. 2C

City Salt Lake City State UT Zip Code 84102

Purpose of Disbursement
CAMPAIGN PRINTING
Candidate Name

Office Sought:	House	Disbursement For:
State:	Senate	Primary
District:	President	General
		Other/Spec: <input checked="" type="checkbox"/>

Category/
Type

Transaction ID: 101230048251883

Date of Disbursement
08 / 28 / 2004

Amount of Each Disbursement This Period

4638.30

Refund or Deposit of Unused
Contributions Required Under
11 C.F.R. 406.10

CAMPAIGN PRINTING

Full Name (Last, First, Middle Initial)

C. Arena Communications

Mailing Address 515 South 700 East, Ste. 2C

City Salt Lake City State UT Zip Code 84102

Purpose of Disbursement
CAMPAIGN PRINTING
Candidate Name

Office Sought:	House	Disbursement For:
State:	Senate	Primary
District:	President	General
		Other/Spec: <input checked="" type="checkbox"/>

Category/
Type

Transaction ID: 101230048251884

Date of Disbursement
08 / 27 / 2004

Amount of Each Disbursement This Period

8101.15

Refund or Deposit of Unused
Contributions Required Under
11 C.F.R. 406.10

CAMPAIGN PRINTING

SUBTOTAL of Disbursements This Page (Include)

20561.72

TOTAL This Period (Add page file line number(s))

FEC Schedule B (Form 3) See 1010000

July 2004 Page 1 of 1

**SCHEDULE B (FBC Form 3)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Related Summary PageFBC LINE NUMBER:
(check only one)

PAGE 39/39

12	17	18	19a	19b
20a	20b	20c	20d	21

Any information copied from such Reports and Statements may not be paid or used by any person for the purpose of collecting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)
John Swadlow For Congress, Inc.

Full Name (Last, First, Middle Initial)

A. Arena Communications

Mailing Address 515 South 700 East, Ste. 2C

City Salt Lake City

State UT

Zip Code 84102

Purpose of Disbursement
CAMPAIGN BROCHURE

Candidate Name

Office Sought:

House

Senate

President

Disbursement For:

Primary

General

Other/Specify

State:

District:

Category/
Type

Transaction ID: 071320040001416

Date of Disbursement

08 / 07 / 2004

Amount of Each Disbursement This Period

2238.75

Refund or Disposal of Excess
Contributions Reported Under
11 C.F.R. 401.60

CAMPAIGN BROCHURE

Full Name (Last, First, Middle Initial)

B. Arena Communications

Mailing Address 515 South 700 East, Ste. 2C

City Salt Lake City

State UT

Zip Code 84102

Purpose of Disbursement
BIOGRAPHY BROCHURE

Candidate Name

Office Sought:

House

Senate

President

Disbursement For:

Primary

General

Other/Specify

State:

District:

Category/
Type

Transaction ID: 071320040001417

Date of Disbursement

08 / 08 / 2004

Amount of Each Disbursement This Period

1485.07

Refund or Disposal of Excess
Contributions Reported Under
11 C.F.R. 401.60

BIOGRAPHY BROCHURE

Full Name (Last, First, Middle Initial)

C. Arena Communications

Mailing Address 515 South 700 East, Ste. 2C

City Salt Lake City

State UT

Zip Code 84102

Purpose of Disbursement
CAMPAIGN BROCHURE

Candidate Name

Office Sought:

House

Senate

President

Disbursement For:

Primary

General

Other/Specify

State:

District:

Category/
Type

Transaction ID: 071320040001418

Date of Disbursement

08 / 14 / 2004

Amount of Each Disbursement This Period

1425.07

Refund or Disposal of Excess
Contributions Reported Under
11 C.F.R. 401.60

CAMPAIGN BROCHURE

GRAND TOTAL of Disbursements This Page (if filled)

31457.72

TOTAL This Period (last page only line number only)

FBC Schedule B (Form 3) Rev. 02/03

29044230958

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFEC LINE NUMBER:
(check only one)

PAGE 40/50

12	17	18	19a	19b
20a	20b	20c	20d	21

Any information copied from both Reports and Schedule(s) may not be paid or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political candidate to solicit contributions from such candidate.

NAME OF COMMITTEE (in full)
John Sanford For Congress, Inc.

Full Name (Last, First, Middle Initial)

A. Arnes Communications

Mailing Address 515 South 700 East, Ste. 2C

City Salt Lake City

State UT

Zip Code 84102

Purpose of Disbursement
CAMPAIGN BROCHURE

Candidate Name

Office Sought:

Home
Senate
President

Disbursement For:

Primary General
Other specify: y

State

District

Category/
Type

Transaction ID: 071320040001410

Date of Disbursement

08 / 16 / 2004

Amount of Each Disbursement This Period

13300.11

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 401.60

CAMPAIGN BROCHURE

Full Name (Last, First, Middle Initial)

B. Arnes Communications

Mailing Address 515 South 700 East, Ste. 2C

City Salt Lake City

State UT

Zip Code 84102

Purpose of Disbursement
CAMPAIGN SUPPLIES

Candidate Name

Office Sought:

Home
Senate
President

Disbursement For:

Primary General
Other specify: y

State

District

Category/
Type

Transaction ID: 071320040001420

Date of Disbursement

08 / 16 / 2004

Amount of Each Disbursement This Period

7636.77

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 401.60

CAMPAIGN SUPPLIES

Full Name (Last, First, Middle Initial)

C. BankCard Center

Mailing Address P.O. Box 20000

City Salt Lake City

State UT

Zip Code 84120-0000

Purpose of Disbursement
See Instructions and D-3

Candidate Name

Office Sought:

Home
Senate
President

Disbursement For:

Primary General
Other specify: y

State

District

Category/
Type

Transaction ID: 071320040001414

Date of Disbursement

08 / 03 / 2004

Amount of Each Disbursement This Period

1701.30

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 401.60

SEE BELOW: CREDIT CARD D-3

GROSS TOTAL of Disbursements This Page (include)

24308.27

TOTAL This Period (and page 40a line number only)

FEC Schedule B (Form 3) Req. 08/2003

Pre-Primary Page 1 of 1

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFEC LINE NUMBER:
(check only one)

PAGE 18/18

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
---	---	---	---	---	---	---	---	---	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----	----

Any information omitted from both Reports and Statements may not be used or relied upon by any person for the purpose of making contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)

John Swafford For Congress, Inc.

Full Name (Last, First, Middle Initial)

A. American Express Merchant Fee

Mailing Address P.O. Box 98888

City
PhoenixState
AZZip Code
85073Purpose of Disbursement
MERCHANT SERVICE FEE

Candidate Name

Office Sought:

House
Senate
President

Disbursement For:

Primary

General

Other (specify):

State:

District:

Category/
Type

Transaction ID: 0007200417E1285

Date of Disbursement

08 / 24 / 2004

Amount of Each Disbursement This Period

58.48

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 403.63

MERCHANT SERVICE FEE

Full Name (Last, First, Middle Initial)

B. Arava Communications

Mailing Address 515 South 700 East, Ste. 2C

City
Salt Lake CityState
UTZip Code
84103Purpose of Disbursement
CAMPAIGN PRINTING

Candidate Name

Office Sought:

House
Senate
President

Disbursement For:

Primary

General

Other (specify):

State:

District:

Category/
Type

Transaction ID: 0007200417E1285

Date of Disbursement

04 / 30 / 2004

Amount of Each Disbursement This Period

6282.02

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 403.63

CAMPAIGN PRINTING

Full Name (Last, First, Middle Initial)

C. Arava Communications

Mailing Address 515 South 700 East, Ste. 2C

City
Salt Lake CityState
UTZip Code
84103Purpose of Disbursement
CAMPAIGN PRINTING

Candidate Name

Office Sought:

House
Senate
President

Disbursement For:

Primary

General

Other (specify):

State:

District:

Category/
Type

Transaction ID: 0007200417E1287

Date of Disbursement

04 / 30 / 2004

Amount of Each Disbursement This Period

5843.20

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 403.63

CAMPAIGN PRINTING

SUBTOTAL of Disbursements This Page (optional)

11583.68

TOTAL This Period (last page this line number only)

FEC Schedule B (Form 3) Rev. 08/2003

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**List expenses separately
for each category on the
Detailed Disbursement PageFOR LINE NUMBER:
(check only one)

PAGE 19/19

2	17	18	19	20	21

Any information omitted from both Reports and Statements may not be held against any person for the purpose of enforcing contribution or for enforcement purposes, other than when the name and address of any political committee is used to solicit contributions from such committee

NAME OF COMMITTEE (in Full)

John Goodland For Congress, Inc.

Full Name (Last, First, Middle Initial)

A. Anna Communications

Mailing Address 515 South 700 East, Ste. 2C

City Salt Lake City

State UT

Zip Code 84102

Purpose of Disbursement
CAMPAIGN PRINTING

Candidate Name

Category/
Type

Office Sought:

House
Senate
President

Disbursement For:

Primary

General

Other (specify) ☒

State:

District:

Transaction ID: C007200417E1200

Date of Disbursement

08 / 04 / 2004

Amount of Each Disbursement This Period

8077.50

Refund or Change of Status
Contributions Reported Under
11 C.F.R. 400.63

CAMPAIGN PRINTING

Full Name (Last, First, Middle Initial)

B. Anna Communications

Mailing Address 515 South 700 East, Ste. 2C

City Salt Lake City

State UT

Zip Code 84102

Purpose of Disbursement
CONVENTION BROCHURE

Candidate Name

Category/
Type

Office Sought:

House
Senate
President

Disbursement For:

Primary

General

Other (specify) ☒

State:

District:

Transaction ID: C007200417E1200

Date of Disbursement

08 / 07 / 2004

Amount of Each Disbursement This Period

3239.04

Refund or Change of Status
Contributions Reported Under
11 C.F.R. 400.63

CONVENTION BROCHURE

Full Name (Last, First, Middle Initial)

C. AT&T

Mailing Address P.O. Box 78228

City Phoenix

State AZ

Zip Code 85022-0228

Purpose of Disbursement
CAMPAIGN PHONE

Candidate Name

Category/
Type

Office Sought:

House
Senate
President

Disbursement For:

Primary

General

Other (specify) ☒

State:

District:

Transaction ID: C007200417E1200

Date of Disbursement

04 / 30 / 2004

Amount of Each Disbursement This Period

303.88

Refund or Change of Status
Contributions Reported Under
11 C.F.R. 400.63

CAMPAIGN PHONE

SUBTOTAL of Disbursements This Page (include) >

11226.42

TOTAL This Period (end page line for number only) >

FEC Schedule B (Form 3) Rev. 05/2003

Pre-Convention

**SCHEDULE B (FBC Form 3)
ITEMIZED DISBURSEMENTS**Use separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE FILING:
(Check only one)

PAGE: 16/20

25	26	27	28	29	30
25a	26a	27a	28a	29a	30a

Any information supplied from such Reports and Disbursements may not be paid or used by any person for the purpose of influencing candidates or for commercial purposes, other than under the name and address of any political committee to which contributions from such committee

NAME OF COMMITTEE (in Full)

John Swartzel For Congress, Inc.

Full Name (Last, First, Middle Initial)**A. Anna Communications**

Mailing Address 816 South 700 East, Ste. 2C

City Salt Lake City

State UT

Zip Code 84102

Purpose of Disbursement
BINDER FOR DELEGATES

Candidate Name

Office Sought:

House
Senate
President

Disbursement For:

Primary
General
Other (specify) ☒

State:

District:

Transaction ID: 0432200448E1243
Date of Disbursement

04 / 01 / 2004

Amount of Each Disbursement This Period

6000.00

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 406.50

BINDER FOR DELEGATION

Full Name (Last, First, Middle Initial)**B. Anna Communications**

Mailing Address 816 South 700 East, Ste. 2C

City Salt Lake City

State UT

Zip Code 84102

Purpose of Disbursement
CAMPAIGN PRINTING

Candidate Name

Office Sought:

House
Senate
President

Disbursement For:

Primary
General
Other (specify) ☒

State:

District:

Transaction ID: 0432200448E1244
Date of Disbursement

04 / 01 / 2004

Amount of Each Disbursement This Period

2570.01

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 406.50

CAMPAIGN PRINTING

Full Name (Last, First, Middle Initial)**C. Anna Communications**

Mailing Address 816 South 700 East, Ste. 2C

City Salt Lake City

State UT

Zip Code 84102

Purpose of Disbursement
CONVENTION DISPLAY

Candidate Name

Office Sought:

House
Senate
President

Disbursement For:

Primary
General
Other (specify) ☒

State:

District:

Transaction ID: 0432200448E1245
Date of Disbursement

04 / 01 / 2004

Amount of Each Disbursement This Period

1500.00

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 406.50

CONVENTION DISPLAY

SUBTOTAL of Disbursements This Page (optional)

11370.00

TOTAL This Period (last page this line number only)

FBC Schedule B (Form 3) Rev. 08/2005

29044230962

April Quarterly

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

 Use separate schedule(s)
for each category of the
Detailed Summary Page

 FOR LINE NUMBER:
(check only one)

PAGE 69/108

☒ 17 ☐ 18 ☐ 19 ☐ 20 ☐ 21
 17 18 19 20 21

Any information copied from such reports and statements may not be used or used by any person for the purpose of influencing contributions or for campaign purposes, other than using the name and address of any political candidate to which contributions were made.

NAME OF COMMITTEE (in full)

John Goodall For Congress, Inc.

Full Name (Last, First, Middle Initial)

A. Arson Communications

Mailing Address 816 South 700 East, Ste. 2C

City Salt Lake City State UT Zip Code 84103

 Purpose of Disbursement
CAMPAIGN PRINTING

Candidate Name

 Office Sought: Home, Senate, President
 Disbursement For: Primary, General, Other Specific

State: District:

 Category/
Type

Transaction ID: 0408200404E1130

Date of Disbursement

01 / 08 / 2004

Amount of Each Disbursement This Period

803.22

 Refund or Disposal of Unused
Contributions Received Under
11 C.F.R. 401.63

CAMPAIGN PRINTING

Full Name (Last, First, Middle Initial)

B. Arson Communications

Mailing Address 816 South 700 East, Ste. 2C

City Salt Lake City State UT Zip Code 84103

 Purpose of Disbursement
CAMPAIGN PRINTING

Candidate Name

 Office Sought: Home, Senate, President
 Disbursement For: Primary, General, Other Specific

State: District:

 Category/
Type

Transaction ID: 0408200404E1130

Date of Disbursement

01 / 08 / 2004

Amount of Each Disbursement This Period

1199.89

 Refund or Disposal of Unused
Contributions Received Under
11 C.F.R. 401.63

CAMPAIGN PRINTING

Full Name (Last, First, Middle Initial)

C. Arson Communications

Mailing Address 816 South 700 East, Ste. 2C

City Salt Lake City State UT Zip Code 84103

 Purpose of Disbursement
CAMPAIGN PRINTING

Candidate Name

 Office Sought: Home, Senate, President
 Disbursement For: Primary, General, Other Specific

State: District:

 Category/
Type

Transaction ID: 0408200404E1131

Date of Disbursement

01 / 08 / 2004

Amount of Each Disbursement This Period

428.87

 Refund or Disposal of Unused
Contributions Received Under
11 C.F.R. 401.63

CAMPAIGN PRINTING

SUBTOTAL of Disbursements This Page (optional)

8638.75

TOTAL This Period (last page this line number only)

FES Schedule B (Form 3) Rev. 02/2003

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**See separate schedule(s)
for each category of the
Detailed Summary PageFOR LINE NUMBER:
(Check only one)

PAGE 70/108

15	17	19	21a	21b

Any information reported from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in full)
John Goodland/For Congress, Inc.Full Name (Last, First, Middle Initial)
A. Aaron Cummings

Mailing Address 916 South 700 East, Ste. 80

City Salt Lake City State UT Zip Code 84103

Purpose of Disbursement
CAMPAIGN PRINTING

Candidate Name

Office Sought: Name: _____
State: _____ District: _____
Disbursement For: Primary General
Other (specify) ☒Transaction ID: 0408200404021132
Date of Disbursement

02 / 08 / 2004

Amount of Each Disbursement This Period

8080.04

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 401.63

CAMPAIGN PRINTING

Full Name (Last, First, Middle Initial)
B. Adelaide

Mailing Address 205 Pennsylvania Avenue, NE

City Washington State DC Zip Code 20003

Purpose of Disbursement
COMPUTER SERVICES AND SOFTWARE

Candidate Name

Office Sought: Name: _____
State: _____ District: _____
Disbursement For: Primary General
Other (specify) ☒Transaction ID: 0408200404021200
Date of Disbursement

01 / 08 / 2004

Amount of Each Disbursement This Period

2000.00

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 401.63

COMPUTER SERVICES AND SOFTWARE

Full Name (Last, First, Middle Initial)
C. ATET

Mailing Address P.O. Box 78228

City Phoenix State AZ Zip Code 85023-0228

Purpose of Disbursement
CAMPAIGN PHONE

Candidate Name

Office Sought: Name: _____
State: _____ District: _____
Disbursement For: Primary General
Other (specify) ☒Transaction ID: 0408200404021108
Date of Disbursement

02 / 27 / 2004

Amount of Each Disbursement This Period

657.84

Refund or Disposal of Excess
Contributions Required Under
11 C.F.R. 401.63

CAMPAIGN PHONE

GRAND TOTAL of Disbursements This Page (addend) >

5097.88

TOTAL This Period (add page line line number only) >

FEC Schedule B (Form 3) See, 1010000

29044230964